

BEFORE THE
Federal Communications Commission

WASHINGTON, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF SECRETARY

In The Matter of)

Amendment of Section 2.106 of the)
Commission's Rules to Allocate)
Spectrum at 2 GHz for Use)
by the Mobile-Satellite Service)

ET Docket No. 95-18

DOCKET FILE COPY ORIGINAL

To: The Commission

**SUPPLEMENTAL COMMENTS
OF THE
CENTRAL IOWA POWER COOPERATIVE**

The Central Iowa Power Cooperative ("CIPCO"), by its attorneys and pursuant to Section 1.415(d) of the Rules and Regulations of the Federal Communications Commission ("Commission" or "FCC"), hereby respectfully submits these Supplemental Comments in the above-captioned proceeding.^{1/}

CIPCO files simultaneously herewith a Motion for Acceptance of Late-filed Supplemental Comments, which requests the Commission to accept these Supplemental Comments, which were filed only one day after the Commission's due date.

^{1/} Notice of Proposed Rule Making, ET Docket No. 95-18, 10 FCC Rcd 3230, 60 Fed. Reg. 11644 (March 2, 1995).

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BACKGROUND

1. CIPCO operates a private microwave system in the vicinity of Cedar Rapids, Iowa. This microwave system is a vital part of an extensive communication system which is used to transfer electric utility data and voice information. CIPCO operates microwave links in the 2110-2145 MHz and 2165-2200 MHz bands (together, "the 2.1 Ghz band") which are proposed for reallocation in this proceeding.

COMMENTS

A. Fixed Services Users Need More Spectrum, Not Less

2. CIPCO requests the Commission to reconsider its proposal to reallocate the 2.1 GHz band from Fixed Service ("FS") users to Mobile Satellite Service ("MSS") providers. At present, there is inadequate spectrum available for relocation of FS users. The bands which were designated for FS relocation by the Commission in its Emerging Technologies proceeding, ET Docket No. 92-9, are the 6, 11 and 18 GHz bands. Since the conclusion of the Emerging Technologies proceeding, however, those bands have become increasingly unavailable for use by FS.

3. However, the demands of utilities and other FS users have continued to increase. While other forms of communications, such as commercial wireless and satellite communications, are increasingly available to the overall public, in many instances, only private microwave systems can meet the needs of utilities for secure and reliable communications. CIPCO urgently requests the Commission to provide FS users with more, not less, private microwave spectrum.

B. CIPCO Opposes Sharing the 2.1 GHz Band With MSS Providers

4. CIPCO strongly opposes COMSAT's suggestion that sharing between MSS and FS is a viable solution in the 2.1 GHz band. Given the rural character of CIPCO's service territory, many of its 2.1 GHz microwave paths are over 18 miles in length. Sharing could involve turning down the microwave power level, which in turn would decrease the signal to noise ratio and render CIPCO's links more susceptible to interference. CIPCO therefore urges the Commission to reject COMSAT's sharing proposal.

5. If the Commission determines that MSS providers do need the 2.1 GHz band, then CIPCO requests the Commission to adhere to its original plan to apply the fundamental PCS relocation rules to the instant proceeding. Specifically, the Commission in its Notice wisely proposed to relocate FS incumbents only with full reimbursement by MSS providers. The Commission should now reject the attempts of the MSS industry to avoid FS relocation (and its attendant reimbursement obligations) through sharing.

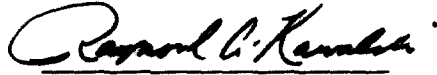
6. Not only is sharing a bad idea, but it simply delays the fact that relocation would eventually occur in the 2.1 GHz band. Even COMSAT notes that sharing would only be a short term solution. Should the Commission decide to reallocate the 2.1 GHz band, CIPCO believes that the Commission should begin the process of reimbursed relocation sooner rather than later.

WHEREFORE, THE PREMISES CONSIDERED, the Central Iowa Power Cooperative respectfully submits the foregoing Supplemental Comments and requests the Federal

Communications Commission to take action in a manner
consistent with the views expressed herein.

Respectfully submitted,

CENTRAL IOWA POWER COOPERATIVE

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